

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed November 19, 2004. Claims 1-60 are pending in the Application and stand rejected. Applicant amends Claims 31, 34, 38, 40, 44, 47, 51, 53, 56, and 58. Applicant also cancels Claims 1-30 without prejudice or disclaimer. Applicant respectfully requests reconsideration and favorable action in this case.

Section 112 Rejections

The Examiner rejects Claims 1, 8, 14, 21, and 26 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicant respectfully disputes this rejection. For the purposes of expediting prosecution, however, Applicant cancels Claims 1-30 without prejudice or disclaimer, thereby obviating the Examiner's rejection. Applicant wishes to note that, with respect to all amendments and cancellations herein, Applicant reserves the right to pursue broader subject matter than that presently claimed through the filing of continuations and/or other related applications.

Claim Rejections – 35 U.S.C. §102

The Examiner rejects Claims 1-60 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,137,791 issued to Frid, et al. (“*Frid*”). Although Applicant respectfully disputes this rejection with respect to Claims 1-30, Applicant cancels Claims 1-30 without prejudice or disclaimer. As noted above, Applicant reserves the right to pursue broader subject matter than that presently claimed through the filing of continuations and/or other related applications.

As amended, Claim 31 recites:

A method for supporting data communications comprising:
detecting, at a base transceiver station, that a mobile unit has entered a geographic area associated with the base transceiver station;
determining, in response to detecting that the mobile unit has entered the geographic area, a home agent for the mobile unit based on a device identifier of the mobile unit;
requesting subscription information from the home agent, wherein the subscription information comprises an internet protocol (IP) address for the mobile unit; and
initiating, by the base transceiver station, registration of a foreign agent with the home agent, wherein the foreign agent is associated with a foreign network, and wherein the registration permits the foreign agent to receive redirect packets from the home agent, the redirect packets containing information for communication to the mobile unit.

Frid fails to disclose, expressly or inherently, every element of amended Claim 31. Applicant respectfully notes that, in rejecting Claim 31, the Examiner improperly equates Claim 31 with Claim 1, despite the differences in the scope of these claims. As a result, the Examiner fails to address several claim elements of Claim 31 in rejecting this claim. Moreover, *Frid* fails to disclose every element of Claim 31 for at least several reasons.

First, *Frid* fails to disclose “detecting, at a base transceiver station, that a mobile unit has entered a geographic area associated with the base transceiver station.” Instead, *Frid* states that, by utilizing identification data received from base station 30, “mobile station 20 realizes that it has traveled into a new geographic area being covered by a new visited mobile switching center (VMSC) 40[.]” Col. 4, ll. 31-34. Thus, in the system of *Frid*, mobile station 20 detects that the mobile unit has entered a geographic area associated with a different base transceiver station. *Frid* does not disclose “detecting, at a base transceiver station, that a mobile unit has entered a geographic area associated with the base transceiver station.”

Second, *Frid* does not disclose “initiating, by the base transceiver station, registration of a foreign agent with the home agent.” As *Frid* clearly indicates “mobile station 20 realizes that it has traveled into a new geographic area being covered by a new visited mobile switching center (VMS) 40 and performs a registration.” Col. 4, ll. 33-36. Thus, *Frid* clearly describes a system in which mobile station 20 initiates registration and requires that mobile station 20 be aware of network mobility. *Frid* does not disclose “initiating, by the base transceiver station, registration of a foreign agent with the home agent” as recited by amended Claim 31.

Thus, *Frid* fails to disclose, expressly or inherently, every element of amended Claim 31. Claim 31 is allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claim 31 and its dependents.

Although of differing scope from Claim 31, Claims 38, 44, 51, and 56 include elements that, for reasons substantially similar to those discussed with respect to Claim 31, are not disclosed by the cited reference. Claims 38, 44, 51, and 56 are thus allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claims 38, 44, 51, and 56, and their respective dependents.

Additionally, many of the dependents of Claim 31 include other elements that are also not disclosed in the cited references. For example, Claim 34 as amended recites:

The method of Claim 31, wherein initiating registration comprises:
generating, with the base transceiver station, a registration request, the registration request comprising the IP address of the mobile unit and an IP address of the foreign agent; and
transmitting the registration request to the home agent.

Frid fails to disclose “generating, with the base transceiver station, a registration request, the registration request comprising the IP address of the mobile unit and an IP address of the foreign agent.” In rejecting previously-presented Claim 34, the Examiner states only that the elements of Claim 34 are “disclosed by GPMSC establishing tunnel through use of HLR (element 50) sending it routing instructions including IP address representing VPMSC and HLR retains information about current location of mobile station and correlating of MIN to mobile IP address.” *Office Action*, p. 5. To whatever extent this may be accurate, Applicant respectfully notes that the Examiner fails to identify any registration request that “compris[es] the IP address of the mobile unit and an IP address of the foreign agent” as recited by amended Claim 34. As the Examiner describes *Frid*, the

HLR “*retains* information . . . correlating of MIN to mobile IP address.” *Office Action*, p. 5, emphasis added. The Examiner fails to identify any registration request that includes “the IP address of the mobile unit and an IP address of the foreign agent” as recited by amended Claim 34. Furthermore, to the extent that any element of the system of *Frid* generates any form of registration request, base station 30 is not the element that performs this generation. Thus, *Frid* also does not disclose “generating, with the base transceiver station, a registration request, the registration request comprising the IP address of the mobile unit and an IP address of the foreign agent” as recited by amended Claim 34.

As a result, *Frid* does not disclose, expressly or inherently, at least these elements of amended Claim 34. Claim 34 is thus allowable for at least these additional reasons. Applicant respectfully requests reconsideration and allowance of Claim 34, as indicated above. Moreover, although of differing scope from Claim 34, Claims 40, 47, 53, and 58 include elements that, for reasons substantially similar to those discussed with respect to Claim 34, are not disclosed by the cited reference. Claims 40, 47, 53, and 58 are thus allowable for at least these additional reasons. As noted above, Applicant requests reconsideration and allowance of Claims 40, 47, 53, and 58.

Conclusion

Applicant has made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

No fees are believed to be currently due, however, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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